

## REMARKS

The Office Action dated February 19, 2004 has been received and carefully considered. In this response, claims 1, 4, 5, 12, 13 and 21 have been amended and claim 2 has been canceled. Support for the amendments to the claims may be found in the specification and figures as originally filed. Entry of the amendments to the claims therefore is respectfully requested. Reconsideration of the outstanding rejections in the present application is further respectfully requested based on the following remarks.

### **Antecedent Rejection of Claim 5**

At page 2 of the Office Action, claim 5 was rejected under 35 U.S.C. § 112, second paragraph, as having insufficient antecedent basis for the limitation of an “embedded controller.” Applicants have amended claim 5 to more clearly recite the limitation of an “embedded graphics controller,” for which there is sufficient antecedent basis. Applicants therefore respectfully request the withdrawal of this rejection.

### **Anticipation Rejection of Claims 1-8, 11-26 and 29**

At page 2 of the Office Action, claims 1-8, 11-26 and 29 were rejected under 35 U.S.C. § 102(e) as being anticipated by Bril (U.S. Patent No. 6,188,413). This rejection is respectfully traversed with amendment.

Claim 1 has been amended to recite, in part, the limitations of an *embedded system on a chip* having a first interface and a second interface, wherein the embedded system on a chip *includes a display controller used to generate second rendered graphics data and provide said second rendered graphics data to an embedded display interface*. Applicants respectfully submit that Bril fails to disclose or suggest an embedded system on a chip and therefore also fails to disclose at least the limitations of an embedded system on a chip having a display controller used to generate rendered graphics data and to provide the rendered graphics data to an embedded display interface. Thus, Bril fails to disclose or even suggest each and every limitation recited in claim 1. Bril also fails to disclose or suggest the limitations recited in claims 2-12 at least by virtue of their dependency on claim 1. Moreover, these claims recite additional features that are

not disclosed or even suggested by the cited references taken either alone or in combination. For example, claim 12 presently recites the limitations of an embedded display interface capable of being disabled to conserve power. Contrary to the Examiner's assertions, the Applicants respectfully submit that these limitations are not inherent to the disclosure of Bril as Bril neither discloses the disablement of an embedded display interface nor does Bril allude to any techniques for power conservation.

Claim 4 has been rewritten in independent form to incorporate many of the limitations of claim 1, from which it previously depended. Claim 4 presently recites, in part, the limitations of an embedded display interface to format a second rendered graphics data for output to a first remote display and an embedded graphics controller to generate a first rendered graphics data to be displayed on an integrated display, said embedded graphics controller having a first interface coupled to a first interface of said embedded system on a chip and a second interface coupled to the integrated display, and wherein said embedded graphics controller further includes a third interface to interface with a second input of said embedded display interface, and further wherein said embedded graphics controller is further used to provide said first rendered graphics data to said embedded display interface for display on a second remote display. To summarize, claim 4 recites the limitations of an embedded graphics controller to provide first rendered graphics data to both an integrated display and to a remote display and an embedded graphics controller to provide second rendered graphics data to another remote display. With respect to these limitations, the Examiner asserts that Bril teaches

CRT and LCD data may be diverted to appropriate data paths merely by counting the number of words diverted to each data path. . . . Therefore, as case [sic] where the remote display is an LCD display is an LCD display, the common data path as shown in an alternate embodiment in Fig. 6 can provide LCD data (a first rendered graphics data) to a (second) remote (LCD) display.

Office Action, p. 4 (citing Bril, col. 12, lines 57-64).

It is respectfully submitted that, contrary to the Examiner's assertions, neither this cited passage nor any other passage of Bril discloses or suggests the provision of first rendered graphics data to both an integrated display and a remote display along with the provision of second rendered graphics data to another remote display. Instead, the cited passage of Bril discloses the use of a shared CRT+LCD FIFO 621 and data tagging to store both CRT data and

LCD data. *See, e.g.,* col. 11, line 58 – col. 12, line 27. Hence, Bril teaches the use of data tagging and/or counting the number of words read from the shared FIFO to identify CRT data intended for display on a CRT and LCD data intended for display on an LCD. Bril, however, does not disclose the provision of CRT data (i.e., first rendered graphics data) to both a CRT (i.e., a first remote display) and a first LCD (i.e., a integrated display) while providing the LCD data (i.e., second rendered graphics data) to a second LCD (i.e., a second remote display) nor does Bril disclose providing LCD data (i.e., first rendered graphics data) to both a CRT (i.e., a first remote display) and an LCD (i.e., an integrated display) while providing the CRT data (i.e., second rendered graphics data) to a second CRT (i.e., a second remote display), where either of these situations represent how claim 4 likely would be interpreted in the context of the disclosure of Bril. Thus, Bril fails to disclose each and every limitation presently recited in Claim 4.

Claim 13, from which claims 14-20 depend, has been amended to recite, in part, the limitations of a memory controller having a first port coupled to a graphics controller and a second port coupled to system memory, said memory controller to provide said graphics controller access to system memory. It is respectfully submitted that Bril fails to disclose the use of system memory and further fails to disclose a memory controller used to provide a graphics controller access to such system memory. Accordingly, Bril fails to disclose or suggest each and every limitation of claim 13 and therefore fails to disclose or suggest each and every limitation of claims 14-20 at least by virtue of their dependency on claim 13. Moreover, these claims recite additional features that are not disclosed or even suggested by the cited references.

Claim 21, from which claims 22-29 depend, has been amended to recite, in part, the limitations of receiving, *at a system on a chip*, a first set of graphics data and a second set of graphics data and processing, *at the system on a chip*, the second set of graphics data to generate a second set of rendered graphics data. As noted above, Bril fails to disclose a system on a chip and therefore fails to disclose the reception of first and second sets of graphics data and the processing of the second set of graphics data at the system on a chip to generate a second set of rendered graphics data. Accordingly, Bril fails to disclose or suggest each and every limitation recited in claim 21 and therefore fails to disclose or suggest each and every limitation recited in claims 22-29 at least by virtue of their dependency on claim 21. Moreover, these claims recite additional features that are not disclosed or even suggested by the cited references.

In view of the foregoing, it is respectfully submitted that the anticipation rejection of claims 1-8, 11-26 and 29 is improper at this time and the withdrawal of this rejection therefore is respectfully requested.

### **Obviousness Rejection of Claims 9, 10, 27 and 28**

At page 5 of the Office Action, claims 9, 10, 27 and 28 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bril in view of Narui (U.S. Patent No. 6,313,813). This rejection is respectfully traversed with amendment.

Claim 1, from which claims 9 and 10 depend, presently recites, in part, the limitations of an embedded system on a chip having a first interface and a second interface, wherein the embedded system on a chip includes a display controller used to generate second rendered graphics data and provide said second rendered graphics data to an embedded display interface. Claim 21, from which claims 27 and 28 depend, presently recites, in part, the limitations of receiving, at a system on a chip, a first set of graphics data and a second set of graphics data and processing, at the system on a chip, the second set of graphics data to generate a second set of rendered graphics data. As noted above, Bril fails to disclose at least these limitations. Applicants respectfully submit that Narui also fails to disclose or suggest at least these limitations. The combination of Bril and Narui therefore fails to disclose each and every limitation recited in claims 9, 10, 27 and 28 at least by virtue of their dependency on one of claims 1 and 21.

Accordingly, it is respectfully submitted that the obviousness rejection of claims 9, 10, 27 and 28 is improper at this time and the withdrawal of this rejection therefore is respectfully requested.

### **Conclusion**

In view of the foregoing, it is respectfully submitted that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number in order to expedite resolution of any issues and to expedite passage of the present

application to issue, if any comments, questions, or suggestions arise in connection with the present application.

Applicants do not believe that any additional fees are due, but if the Commissioner believes additional fees are due, the Commissioner is hereby authorized to charge any fees which may be required, or credit any overpayment, to Deposit Account Number 50-0441.

Date

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Respectfully submitted,



Ryan S. Davidson, Reg. No. 51,596,

On Behalf Of

J. Gustav Larson, Reg. No. 39,263,

Attorney for Applicants

TOLER, LARSON & ABEL, L.L.P.

5000 Plaza On The Lake, Suite 265

Austin, Texas 78746

(512) 327-5515 (phone) (512) 327-5452 (fax)